Global Data Privacy Notice:

Annex 1.
Information on processing of personal data on Health Care Professionals

CRM – Marketing

(Version 1.1)

According to Article 12 of the General Data Protection Regulation, we must provide you with certain information when we process information about you. This Privacy notice is directed to Health Care Professionals with whom ALK-Abelló A/S communicates in relation to prevention and treatment of allergies, our products and services, seminars, training and events, scientific research and our Company's activities in general.

ALK-Abelló A/S respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we collect, process, and share your personal data to communicate with you in your capacity as health care professional.

The information we must provide you with is as follows:

- Who is the data controller
- What is the purpose of the processing
- What is the basis for processing
- Who is the source of your personal data
- What processing is done on your personal data
- What categories of personal data
- Who has access to your personal data – recipients or categories of recipients
- What is the retention period
- What are your rights
- Right to appeal

1. DATA CONTROLLER IN RELATION TO THE PROCESSING

The data controller for the processing described in this notice is:

[ALK-Abelló A/S
Bøge Allé 6-8
2970 Hørsholm
CVR 63717916]

This signifies that ALK-Abelló A/S determines the objectives for processing your personal data as well as the mthods used for such processing. If you have questions regarding this Privacy Notice or our processing of personal data in general, please contact us at data.protection.net.

We have appointed a Data Protection Officer which you may contact at:

Bech-Bruun Advokatpartnerselskab
CVR nr.: 3853 8071
Gdanskgade 18
2150 Nordhavn
Denmark
Telephone: + 45 72 27 30 02
E-mail: dpo.alk@bechbruun.com
Secure E-mail Function via: https://dpo.bechbruun.com/alk

2. THE DATA WE COLLECT AND FROM WHICH SOURCES

To communicate with you on subjects which we believe may have your interest we may process the following personal information:

- name, email, telephone number, postal address
- organisation that you work for and professional details,
- educational details, qualifications and publications
- Survey data, including your responses and additional information you may have chosen to provide
- We will also process information on the communication we have had and seminars, training and other events you have participated in on our invitation.

Some information we may receive from you when we meet in person at conferences or other events, when you interact with us at our website, or when we communicate with each other.

We may also collect data from publicly available sources such as websites, publications, media coverage, or from third party providers, e.g., reference databases like OneKey.

3. THE PURPOSES FOR PROCESSING OF YOUR PERSONAL DATA

The purposes for collecting this information on you are:

a) to enable us to proactively communicate and provide information to health care professionals which we believe may have an interest in our products and services.

b) to enable us to reactively respond to queries and requests from you or other communications on your initiative

c) to target our communication and invitations to seminars, training and events to you to fit what we believe is of most relevance and interest to you

d) to be able to provide public authorities documentation for our communications and activities targeted at health care professionals.

4. THE LEGAL BASIS FOR PROCESSING OF YOUR PERSONAL DATA

The legal basis for our processing of your personal data for the above purposes is our legitimate interest to provide information to the health care sector of our products and services and generally to increase awareness of allergy and related diseases cf. The General Data Protection Regulation Article 6(1)(f). We have conducted a balancing test to ensure that our interest is not overridden by your interests or fundamental rights and freedoms.

4. 1 Performance of contract

When you register for and participate in seminars, webinars or training events etc. we process your personal data to perform and administer the contract to which you are a party or in order to take steps at your request prior to entering into a contract. The legal basis for our processing of your personal information is the General Data Protection Regulation Article 6(1)(b).

4. 2 Comply with legal obligation

Where we are legally required to keep records of our communication and training and events you have participated in on our invitation, the legal basis for our processing is the General Data Protection Regulation Article 6(1)(c) cf. the Ministerial order on Marketing of Medicines

We may be legally required to send you pharmacovigilance communication related to products. The legal basis for our processing of your personal information for such purposes is the General Data Protection Regulation Article 6(1)(c) cf. the Medicines Act.

4.3 E-marketing

We will only send e-mail marketing communications to you if you have provided your specific consent, cf. General Data Protection Regulation 6(1)(a). You may at any time withdraw such consent.

5. DISCLOSURE OF YOUR PERSONAL DATA

We collect and process your data for our own purposes. We may however, subject to a valid legitimate interest to do so, share your personal data with other entities in the ALK group of companies, but only for the above specified purposes.

To the extent we are legally required to do so we may share your personal information with public authorities requesting us to disclose this information, including where we on request are required to document our sponsored activities targeted at health care professionals.

We disclose your personal data to our data processors, who process the information on behalf of us and in accordance with our instructions. We use external parties for, e.g. hosting, analytics and communication services. The data processors may not use the information for any other purpose than fulfilling the agreement with us and are subject to confidentiality. We have entered into data processing agreements with all our data processors, who process personal data on our behalf.

We will not transfer your personal data to recipients outside EU or EEA unless we have ensured compliance with GDPR Chapter V. To ensure that your personal information receive an adequate level of protection we have ascertained that sufficient safety measures have been implemented to allow for the transfer, including where the European Commission have deemed the country to provide an adequate level of protection for personal data; or by use of specific contracts approved by the European Commission (Standard Contractual Clauses) which give personal data essentially equivalent protection as it has in Europe. If you require further information about on our current data processors established outside the EEA and the safety measures in place to allow for the transfer of personal data, you can request it from us – please send your request to us/our Data Protection Officer.

6. DATA RETENTION

Your personal data will be deleted when we no longer have a legitimate purpose to process your data. Generally, this will happen in accordance with the below time frames:

- When we become aware that you are no longer working as a health care professional

- If you, on grounds relating to your particular situation, object to our processing based on our legitimate interest, unless we can demonstrate overriding compelling legitimate grounds for continued processing.

- If we are processing your information on basis of your consent, if you are withdrawing your consent and where there is no other legal ground for the processing.

Data may be retained for a longer period if we are legally obliged to do so, or if retention is necessary to establish, exercise or defend legal claims.

4. 7. YOUR RIGHTS

The General Data Protection Regulation give you rights in relation to our processing of your personal data.

If you wish to make use of your rights, please contact us by using the information stated in section 1.

- Right to access
    - You can request access to the personal data that we have registered about your, as well as a range of additional information.
- Right to rectification
    - You have the right to have inaccurate personal information about you corrected.
- Right to erasure
    - Above you can read about our retention period. In particular cases, you may have the right to have personal data about you erased before our general deletion deadline occurs.
- Right to restriction of processing
    - In certain cases, you may have the right to restrict the processing of your personal data. If you are entitled to restriction, we may only process the information – apart from storage – with your consent, or for the establishment, exercise, or defence of legal claims, or to protect a person or important public interests.
- Right to object
    - You have the right to object about our processing of your personal data. If you object to ALK's processing of your personal data for specific reasons to your particular situation. ALK must not further process the personal data unless ALK demonstrates compelling legitimate grounds for the processing that override your interests, rights and freedoms, or if the processing is necessary for the establishment, exercise, or defence of legal claims.
- Right to data portability
    - In certain cases, you have the right to receive your personal data in a structured, commonly used, and machine-readable format and to have these personal data transferred from one data controller to another without hindrance.

We may for specific purposes ask for your consent to collect and process your personal data. Where our processing is solely based on your specific consent you have the right to with-draw your consent at any time. Such withdrawal will not affect the lawfulness of processing based on consent before its withdrawal.

You have the right to lodge a complaint with Datatilsynet, if you are dissatisfied with the way we process your personal data. You can find contact information to Datatilsynet on www.datatilsynet.dk.

5. 8. CHANGES TO THIS PRIVACY NOTICE

This privacy notice may be updated from time to time to reflect changing legal, regulatory, or operational requirements.